

**RIC 2002**  
**Session W2**  
**Reactor Oversight Process**

**Perspective From**  
**State of Illinois**

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# Background:

- Illinois has made an extensive commitment to nuclear power with 11 operating reactors at 6 stations.
- The Illinois Department of Nuclear Safety (IDNS) has an very extensive nuclear safety program including highly qualified resident inspectors at each operating nuclear station.
- IDNS has long been a supporter of the concept of risk informed regulation.
- IDNS staff participated on the RROP's Pilot Plant Evaluation Panel and have been active in following the RROP program from its inception.
- Quad-Cities Station was one of the nine pilot plants evaluated under the RROP
- The following comments are based on IDNS observations and opinions of how well the RROP is addressing the Commission's stated goals of "maintaining safety, enhancing public confidence, improving effectiveness and efficiency of the oversight process, and reducing unnecessary regulatory burden."

# Maintain Safety:

- The RROP appears to be maintaining safety, since there have been no significant events affecting the safety of the offsite public since its inception.
- IDNS continues to be concerned that the RROP relies on plant risk assessments developed without specific regulatory requirements or standards.
- We are still skeptical that adverse trends in the cross cutting issues of human performance, safety culture, and problem identification and resolution will manifest themselves in the degradation of other performance indicators in a manner that is timely for preservation of existing margins of safety.
- The significance determination process is based on plant risk assessments of varying quality and uses thresholds which appear to have resulted in an excessive amount of green findings.

# Enhancing Public Confidence:

- The RROP provides a far more scrutable and objective process for evaluating individual plant safety.
- It provides the potential for predictability and consistency of the oversight process from plant to plant and region to region.
- The NRC website presentations of plant performance indicators, inspection results, and inspection report summaries are easily accessed and about as readily understandable as such a complex process can be made to be.
- NRC efforts to include stakeholder advice and participation in the development of the RROP has been extensive.
- However, the interest level displayed by the general public has been low, as evidenced by poor attendance at NRC meetings in Illinois to inform the public of the RROP. NRC needs to consider other avenues and/or techniques for getting its message to the general public.

# Improving Efficiency and Effectiveness of the Regulatory Process:

- IDNS believes the RROP's risk informed approach is more efficient because it focuses inspection and utility resources on systems, components, and procedures most important to safety, potentially resulting in an overall increase in the margin of safety.
- We are less confident that it is more effective due to the inability to directly measure cross cutting issues. More time is needed to instill confidence that these issues will manifest themselves in existing performance indicators.

# Reducing Unnecessary Regulatory Burden:

- The level of regulatory burden has been reduced under the RROP as evidenced by the reduction in: requirements for responding to non-cited violations; the number of resident inspectors; and utility resources needed to remediate inspection findings. The degree to which those burdens were unnecessary is still an issue of debate among many state and federal inspectors